

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CASE NO. 4:21-cv-784
	§	
SUHYUN AN, JOHNSON MEDICAL	§	
GROUP PLLC ( <i>d/b/a</i> Campbell Medical	§	
Clinic), and CAMPBELL MEDICAL	§	
GROUP, PLLC,	§	
	§	
Defendants.	§	

**NOTICE OF POTENTIAL SETTLEMENT AND MOTION TO STAY CASE**

Counsel for the United States of America wishes to notify the Court that the parties have tentatively reached a settlement resolving the claims in this matter. Because the settlement must be reviewed and approved by multiple government agencies, it may take a number of weeks to be finalized and signed by all parties.

In the interim, the United States moves to stay this case for 60 days. This stay would suspend the Defendants’ answer deadlines (currently set for May 10, 2021) and the initial pretrial and scheduling conference set for June 18, 2021. If the settlement has been effectuated before the end of the 60-day period, the United States will file appropriate dismissal papers.<sup>1</sup> If the settlement breaks down and the stay should be lifted, the United States will file a notice and will request that Defendants be ordered to answer the Complaint within 21 days of the order lifting the stay.

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<sup>1</sup> Because the proposed settlement provides that the claims in this action may be reinstated if the Defendants default on their obligations, the Rule 41 stipulation will specifically state that the action is being dismissed “subject to the terms of the settlement agreement.”

Dated: April 26, 2021

Respectfully submitted,

RYAN K. PATRICK  
United States Attorney

/s/ Brad R. Gray

Brad R. Gray  
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*Counsel for the United States of America*

**CERTIFICATE OF CONFERENCE**

I certify that, on April 26, 2021, I corresponded via email with Lynette Byrd, counsel for the Defendants, who confirmed that she was unopposed to the motion to stay the case.

/s/ Brad R. Gray

Brad R. Gray  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I certify that on April 26, 2021, a true and correct copy of this document was filed via CM/ECF. In addition, I will email a true and correct copy of this document to Lynette Byrd, counsel for the Defendants, at [lsb@federal-lawyer.com](mailto:lsb@federal-lawyer.com).

/s/ Brad R. Gray

Brad R. Gray  
Assistant United States Attorney